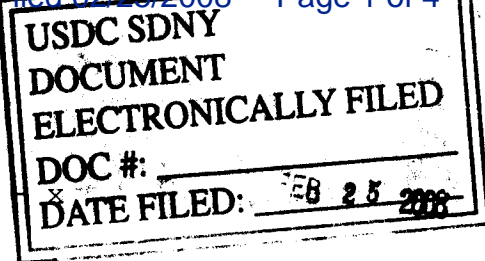


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

INDICTMENT

- v. -

DAMIEN ANTHONY SCANLON,

Defendant.

08 Cr.

08 CRIM 150

COUNT ONE

The Grand Jury charges:

1. In or about January 2008, in the Southern District of New York and elsewhere, DAMIEN ANTHONY SCANLON, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Section 1956(a)(1)(B)(i) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that DAMIEN ANTHONY SCANLON, the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, the transfer of more than one million dollars, represented the proceeds of some form of unlawful activity, unlawfully, willfully and knowingly would and did conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, knowing that the transactions were designed in whole

and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of that specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Overt Act

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about January 30, 2008, in New York, New York, DAMIEN ANTHONY SCANLON, the defendant, possessed approximately \$1.5 million in United States currency.

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION AS TO COUNT ONE

4. As a result of committing the money laundering offense alleged in Count One of this Indictment, DAMIEN ANTHONY SCANLON, the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 982, any and all property, real and personal, involved in the money laundering offense and all property traceable to such property, including but not limited to the following:

a. All United States currency recovered on or about January 30, 2008, from two bags in the possession of DAMIEN ANTHONY SCANLON, the defendant, in the vicinity of 851 8th Avenue, New York, New York, which includes approximately

\$1,587,920 in cash.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

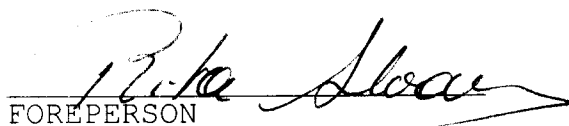
c. has been placed beyond the jurisdiction of the Court;

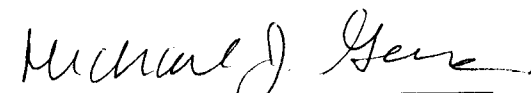
d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. §§ 982 and 1956 and 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1956.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

DAMIEN ANTHONY SCANLON,

Defendant.

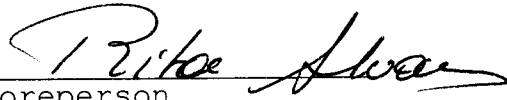
INDICTMENT

08 Cr. _____

(Title 18, United States Code,
Section 1956(h).)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

2/25/08 Filed indictment. Case assigned
to Judge Buchwald.
S. Maj. Judge Lutz